

Guletz, Matthew D.

From: Guletz, Matthew D.
Sent: Monday, November 15, 2010 5:30 PM
To: Mitchell B. Stoddard
Cc: Hohn, Christopher
Subject: FW: Nixon v. Enterprise – Letter re Nixon's Discovery Responses

Mitch,

In keeping with L.R. 37 – 3.04, I write in the second good faith attempt to resolve a discovery dispute.

On November 5, we sent you the email below and the attached letter. The letter outlined certain deficiencies in Plaintiff's discovery responses and document production. We requested that Plaintiff rectify these shortcomings or that you contact us to discuss within a reasonable period of time (*i.e.*, November 15).

We heard no response. We interpret this silence to mean that Plaintiff does not intend to supplement her discovery responses and that it is necessary for Enterprise to file a motion to compel. If our interpretation is incorrect and Plaintiff does in fact intend to supplement her discovery responses and document production, we ask that you let us know immediately so that Enterprise can avoid the expense of filing the motion.

Thanks,

Matthew D. Guletz
mguletz@thompsoncoburn.com
P: 314.552.6311
F: 314.552.7311
M: 314.602.6311

Thompson Coburn LLP
One US Bank Plaza
St. Louis, MO 63101
www.thompsoncoburn.com

From: Guletz, Matthew D.
Sent: Friday, November 05, 2010 5:56 PM
To: Mitchell B. Stoddard
Cc: Hohn, Christopher
Subject: Nixon v. Enterprise -- Letter re Nixon's Discovery Responses

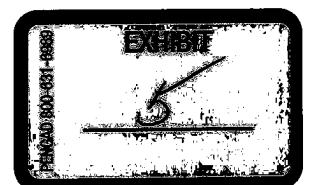
Mitch,

Attached find a meet-and-confer letter under Local Rule 37 – 3.04 regarding Nixon's discovery responses and document production. We look forward to hearing from you. Thanks.

Matt



nixon_disco_letter.
pdf



Matthew D. Guletz

mguletz@thompsoncoburn.com

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M: 314.602.6311

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